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January 22, 1992

Federal Communications Commission
Office of the Secretary

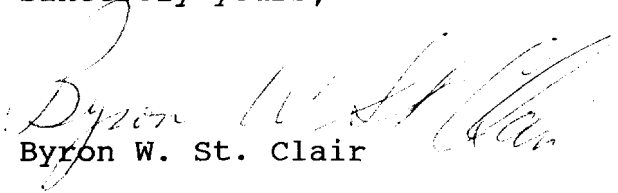
Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: MM Docket No. 87-268

Dear Ms. Searcy:

Enclosed are 10 copies of "Reply Comments" in the above docket. Leave to file these comments after the deadline of January 20th is hereby requested. This delay was the result of difficulties over the holiday period in getting copies of the filed comments.

Sincerely yours,


Byron W. St. Clair

BSC:ssg

Enclosures

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Reply Comments: MM Docket 87-268
Advanced Television Systems and Their Impact
Upon the Existing Television Broadcast Stations

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Should the ATV Channels be Paired?

Comments from several sources recommended that the new ATV channels be paired with the corresponding NTSC channel as part of the channel assignment process. Based upon experience in picking sites or finding workable TV channels at designated sites I think the Commission will find that all possible flexibility will be needed and a good deal of local knowledge required if the maximum possible number of ATV channels is to be identified and at the same time the impact on LPTV stations and translators is to be held to a minimum.

The NPRM (Para. 16) states "...we proposed to treat all ATV channels as equivalent", and there is no evidence to suggest that this is not substantially correct as far as technological considerations are concerned. However, there are good engineering reasons why certain channels can be used more readily at one location than another within a market:

1.) Given intermodulation and other interference considerations a particular channel may be unusable at one location within a market, but entirely satisfactory at another. This consideration becomes critical where many communications facilities are clustered on the roof of one building. I have even seen the issue raised in connection with the proposed addition of a new transmitting frequency at a hill top electronic site where there are many users on separate but close towers. I think it is realistic to assume most existing stations will want to colocate their ATV transmission plant with their existing NTSC transmitter and antenna. Thus they will need the option of selecting a channel with no interference potential at their site from among those available for their market.

2) In many markets stations are not clustered. In these markets particular ATV channels will in some, and probably many, cases be more usable at one NTSC site than

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another.

As local knowledge of matters such as terrain and those transmit and receive frequencies which might participate in an inter-modulation or other interference problem will be essential, the selection of specific ATV channels from those assigned to a market should be kept entirely flexible.

If the Commission determines that assigned pairing of specific channels is essential to keep the process orderly, then it will be necessary to set up a review process with a plan for the mandatory exchange of ATV channels upon a showing of engineering advantage in terms of protecting existing LPTV stations or translators. The process must be heavily biased in favor of requiring changes based upon engineering considerations related to interference and against arbitrary desires of any station to keep an originally assigned channel.

Coverage Permitted by or Required of Simulcast ATV Stations

Westinghouse¹ states "Furthermore, every effort should be made to allow stations (at a minimum) to serve their entire service area with an HDTV signal." I would like to suggest that when compromises are necessary they should be made in the opposite direction, so that translators and LPTV stations can be most fully preserved. Noting that this problem will exist primarily during the simulcast period I suggest:

1.) The growth of the HDTV set population would surely not be inhibited if some ATV stations did not have quite the full reach of the corresponding NTSC station during the simulcast period. The time of transitioning to exclusive ATV transmissions would not be delayed if some ACT stations had reduced coverage, in the interest or preserving LPTV stations or translators, during the transition period.

2.) When the operation of NTSC stations is terminated, there should be ample flexibility to adjust any channel assignment that is, at that time, inhibiting full coverage by any ACT station.

Comments of EIA Concerning Secondary Status of LPTV Stations and Translators

The Electronics Industry Association/Consumer Electronics Group²

1. Page 3, II Allotments and Assignment, 2nd paragraph

2. C. Spectrum Issues, pg. 8

offers the opinion that LPTV and translator stations should, in accordance with their secondary status, yield to the needs of the ATV channel assignment process, stating "This approach will help to speed the availability of ATV programming to the public and accelerate the date when the volume of ATV programming is sufficient to stimulate demand for the necessary reception and display equipment.

Actually just the opposite could be the case. Consider that a full service station must, in order to transmit ATV material, install at least one path of studio and switching equipment, studio to transmitter connection, transmitter and antenna. In contrast, numerous LPTV stations are directly satellite fed. Such an LPTV station could switch to ATV as soon as a satellite source of ATV programming is available, utilizing a direct on site connection between a satellite receiver and the transmitter, as now. It is not now known if an NTSC transmitter, low or high power, can be modified to transmit the to-be-selected ATV system signals, but, even if the LPTV transmitter has to be replaced, the cost of getting into the ATV mode would be a small fraction of the cost for a larger station to install the minimum necessary equipment. Thus, it must be recognized that LPTV stations can be a significant positive factor in providing enough ATV signals to interest the public in buying receiving equipment, and to do this early in the game.

Beyond this I would venture the personal opinion that, if the authors of the EIA/CEG comments had invested their own money in constructing an LPTV station or lived in a area where they were dependent upon translators for their over-the-air television service they would not be so quick to suggest such stations be given short shrift, whether they are of secondary status or not.

Spectrum Space for Studio- Transmitter Links

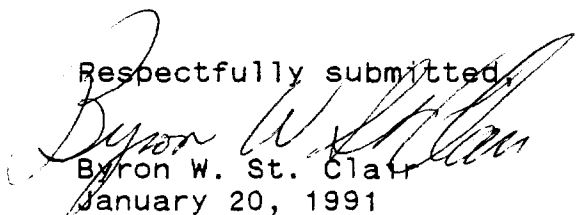
This paragraph is not specifically directed to any one original comment, rather it is prompted by the realization that no one mentioned the problem of finding spectrum space for a large number of additional studio-transmitter links. Along with increased need there will be a loss of capacity as existing STL's and other relays operating on vacant UHF channels in accordance with Para.74.602 find these presently vacant channels no longer available. In the trade press reports of digital audio broadcasting there has been mention of the possibility of spectrum in L band being changed from governmental use to non-government use, as apparently the needs of the military for this band is diminishing. The possibility of using spectrum around 1500 MHz. for relay purposes, at least during the simulcast period, should be explored.

Reply to comments of the National Cable Television Association

NCTA³ in its comments is very explicit in its demands that CATV systems not be burdened with any formal obligations to carry any particular channels, NTSC or ATV. Yet the widespread availability of ATV channels necessary for public acceptance can hardly be achieved without universal cable carriage. As a volunteer member of the Board of Directors of a non-commercial public television station, I have witnessed first hand the insensitivity of cable systems to the public interest. I firmly believe the Commission will have to mandate appropriate carriage policies. In particular, I would urge that cable systems not be allowed to delete local LPTV stations, which, if they are on nearby cable systems, are often there only after a protracted struggle.

Cable operators could, in many circumstances, make available channels beyond the actual carrying capacity of their cable and amplifiers. MMDS operators have resorted to the technique of picking up good quality signals directly off-the air- at the subscribers home and adding them to the channels relayed by MMDS in the subscribers selection box. Thus, the subscriber selects a desired channel without being concerned whether it arrived at the selection box directly over the air or via an MMDS channel. I submit that many cable systems, and indeed most in metropolitan areas, could, by using this technique, deliver all ATV related extra channels which might be desirable during the simulcast period without deleting any existing channels. The "Public Interest" requires them to do so.

Respectfully submitted,


Byron W. St. Clair
January 20, 1991